

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GALILEO MONDOL, ALISON HINES, AND
MARK MONDOL,

Plaintiffs,

v.

C.A. No. 1:15-cv-13697-ADB

CITY OF SOMERVILLE,
JOSEPH CURTATONE,
ANTHONY PIERANTOZZI, AND
GEORGE SCARPELLI,

Defendants.

**DEFENDANTS' CITY OF SOMERVILLE, JOSEPH CURTATONE,
ANTHONY PIERANTOZZI, AND GEORGE SCARPELLI'S**

**MOTION TO FILE EXHIBITS 1 AND 2
TO THEIR REPLY TO PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT UNDER SEAL**

The defendants in the above-captioned action hereby respectfully request that this Honorable Court allow them to file Exhibit 1 and Exhibit 2 to their Reply under seal pursuant to Local Rule 7.2. As grounds for this Motion, the Defendants state that the Exhibit 1 is the complete deposition transcript of victim A.D., which contains voluminous references to minors with regard to the Incident, and Exhibit 2 is a transcript of a video taped state police interview, which is highly personal and subject to a confidentiality agreement with the D.A.'s Office. Neither should be made public on the docket and it should be noted that the defendants referred to all minors involved by initials within all of their filings.

Respectfully Submitted,
The Defendants,
City of Somerville, Mayor Joseph Curtatone,
Anthony Pierantozzi, and George Scarpelli,
By their attorneys,

/s/ Leonard H. Kesten

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those participants indicated as non-registered participants.

/s/ Leonard H. Kesten

Leonard H. Kesten, BBO# 542042

Dated: April 25, 2016